

*IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION*

BARBARA MEIER; <i>et al.</i> ,	§	
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	§	Civil Action No. 4:18-cv-00615-ALM
	§	Judge Mazzant
v.	§	
	§	
	§	
UHS OF DELAWARE, INC., <i>et al.</i>	§	
	§	
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<i>Plaintiffs,</i>	§	
	§	
	§	
	§	
	§	
<i>Defendants.</i>	§	
	§	

**CHANG DEFENDANTS, YAO, BUTTAR, TAO, AND TOM'S
JOINT OBJECTIONS TO PLAINTIFFS' REVISED TRIAL WITNESS LIST**

COME NOW, Defendants Dr. Yupo Jesse Chang, Universal Physicians, PA, Dr. Says, LLC, MD Reliance, Inc., Office Winsome, LLC (“Chang Defendants”); Yung Husan Yao (“Yao”); and Harmanpreet Buttar, M.D., Qingguo Tao, M.D., and Timothy Tom, M.D. (“Dr. Buttar,” “Dr. Tao,” and “Dr. Tom”) (collectively, Dr. Buttar, Dr. Tao, Dr. Tom, Yao and the Chang Defendants are hereinafter referred to as “Defendants”) by and through their respective undersigned counsel, and submit the following Objections to Plaintiffs’ Revised Trial Witness List.

Defendants reserve the right to supplement, modify or withdraw any of the objections made.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on counsel of record ***via the CM/ECF System*** on this the 27th day of February, 2020.

/s/ Dana Morgan
Dana Morgan

GENERAL/GLOBAL OBJECTIONS TO PLAINTIFFS' REVISED WITNESS LIST

Defendants object to the testimony of any Plaintiff or witness affiliated with a Plaintiff against any Defendant if said Plaintiff does not have a cause of action against that Defendant. *See* F.R.E. 401, 403. This is especially true with respect to those Plaintiffs who do not assert claims against certain Defendants and, appropriately, did not identify those Defendants as parties they are “suing” in the Joint Final Pre-Trial Order.¹

For example, Plaintiffs Madison Hough, Govinda Hough, and Jason Hough do not assert claims against any of these Defendants and, appropriately, did not include them as parties they are suing in the Joint Final Pretrial Order (Dkt. # 508). Therefore, Defendants object to the testimony of Plaintiffs Madison Hough, of Govinda Hough, of Jason Hough and/or of witnesses associated with these Plaintiffs or any other Plaintiffs who do not have claims against one, some, or all of these Defendants as same would be irrelevant, wholly prejudicial, probative of nothing as to these Defendants and would mislead the jury. F.R.E. 401, 403. Accordingly, Defendants make the below specific objections as follows:

SPECIFIC OBJECTIONS TO PLAINTIFFS' REVISED TRIAL WITNESSES

WILL CALL

Witness Name	Plaintiffs' Description of Witness	Objection
Verne Meier	Husband/ex	None at this time.
Holley Meier Graves	Verne Meier's Daughter	None at this time.

¹ Joint Final Pre-Trial Order, Dkt. # 508, at 5; *see, e.g., id.* at 8 (“The Houghs are suing Mayhill (facility); Dr. Faheem (Mayhill facility psychiatrist); UHS (owner and operator of facility); and Chad Ellis” and failing to list these Defendants).

Witness Name	Plaintiffs' Description of Witness	Objection
Cindy Meier Roeschen	Verne Meier's Daughter	None at this time.
Sherry Meier	Verne Meier's Daughter	None at this time.
Bill Crowell	Plaintiff	Relevance. F.R.E. 401. More prejudicial than probative, danger of confusing the issues and misleading the jury. F.R.E. 403.
Dasha Crowell	Bill Crowell's wife	Relevance. F.R.E. 401. More prejudicial than probative, danger of confusing the issues and misleading the jury. F.R.E. 403.
Diane Creel	Plaintiff	None at this time.
Lynn Creel	Plaintiff	None at this time.
Jalisa Green	Plaintiff	None at this time.
Mike Swann	Jalisa Green's fiancée	None at this time.
Yolanda McPherson	Plaintiff	None at this time.
Troy Harvey	Plaintiff	None at this time.
Becky Harvey	Troy Harvey's wife	None at this time.
Madison Hough	Plaintiff	Relevance. F.R.E. 401. More prejudicial than probative, danger of confusing the issues and misleading the jury. F.R.E. 403.
Govinda Hough	Plaintiff	Relevance. F.R.E. 401. More prejudicial than probative, danger of confusing the issues and misleading the jury. F.R.E. 403.
Jason Hough	Plaintiff	Relevance. F.R.E. 401. More prejudicial than probative, danger of confusing the issues and misleading the jury. F.R.E. 403.
Sandra Stokes	Plaintiff	Relevance. F.R.E. 401. More prejudicial than probative, danger of confusing the issues and misleading the jury. F.R.E. 403.
Doug Stokes	Sandra Stokes' dad	Relevance. F.R.E. 401. More prejudicial than probative, danger of confusing the issues and misleading the jury. F.R.E. 403.

Witness Name	Plaintiffs' Description of Witness	Objection
Judith Stokes	Sandra Stokes' mom	Relevance. F.R.E. 401. More prejudicial than probative, danger of confusing the issues and misleading the jury. F.R.E. 403.
Tiffany Young	Plaintiff	None at this time.
Clint Young	Tiffany Young's husband	None at this time.
Mark Blotcky		Subject to Court's Mem. Op & Order (Dkt. No. 581), no further objection at this time.
Rebecca Busch		Subject to Court's Mem. Op & Order (Dkt. No. 581), no further objection at this time.
Mike VanAmburgh		None at this time.
Amy Offutt		Subject to Court's Mem. Op & Order (Dkt. No. 581), no further objection at this time.

MAY CALL

Witness Name	Plaintiffs' Description of Witness	Objection
Benjamin McPherson	Yolanda McPherson's husband	None at this time.
Sheila Mosley	Yolanda McPherson's sister	None at this time.
Sheila Stuman	Yolanda McPherson's friend	Not timely disclosed. F.R.C.P. 26(a), 26(e). Relevance. F.R.E. 401. Undue waste of time or presentation of cumulative evidence. F.R.E. 403.
Mary Gray	Houghs' friend who knew them before and after	Not timely disclosed. F.R.C.P. 26(a), 26(e). Relevance. F.R.E. 401. More prejudicial than probative, danger of confusing the issues and misleading the jury. F.R.E. 403.

Witness Name	Plaintiffs' Description of Witness	Objection
Gary Gray	Houghs' friend who knew them before and after	Not timely disclosed. F.R.C.P. 26(a), 26(e). Relevance. F.R.E. 401. More prejudicial than probative, danger of confusing the issues and misleading the jury. F.R.E. 403.
Kim Schofield	Hough tax accountant	Not timely disclosed. F.R.C.P. 26(a), 26(e). Relevance. F.R.E. 401. More prejudicial than probative, danger of confusing the issues and misleading the jury. F.R.E. 403.
Janelle Davis	Madison Hough TWU Kinesiology	Not timely disclosed. F.R.C.P. 26(a), 26(e). Relevance. F.R.E. 401. More prejudicial than probative, danger of confusing the issues and misleading the jury. F.R.E. 403.
Dak Rothberg	Diane Creel's son	None at this time.
Michelle Lasser	called Diane frequently after BHB incident	Not timely disclosed. F.R.C.P. 26(a), 26(e). Relevance. F.R.E. 401. Undue waste of time or presentation of cumulative evidence. F.R.E. 403. More prejudicial than probative, danger of confusing the issues and misleading the jury. F.R.E. 403.
Darin Bass	coworker Creel	Not timely disclosed. F.R.C.P. 26(a), 26(e). Relevance. F.R.E. 401. Undue waste of time or presentation of cumulative evidence. F.R.E. 403. More prejudicial than probative, danger of confusing the issues and misleading the jury. F.R.E. 403.
Matthew Hough	Jason & Govinda Hough's son/ Madison's brother	Relevance. F.R.E. 401. More prejudicial than probative, danger of confusing the issues and misleading the jury. F.R.E. 403.
Dr. Islam	Medical Director at Mayhill	None at this time.
Dr. Chaudry	Dr. Islam's wife, PCP Meier	None at this time.
State Rep: Bill Zedler		Subject to Court's Mem. Op & Order (Dkt. No. 581), no further objection at this time.

Witness Name	Plaintiffs' Description of Witness	Objection
State Rep: Stephanie Kick		Subject to Court's Mem. Op & Order (Dkt. No. 581), no further objection at this time.
Sabahat Faheem		None at this time.
Gary Malone		None at this time.
Sejal Mehta		None at this time.
Jamal Rafique		None at this time.
Bianca Mickan		None at this time.
Terri Haskett		None at this time.
Roni Gonzales		Not timely disclosed. F.R.C.P. 26(a), 26(e). Relevance. F.R.E. 401. More prejudicial than probative, danger of confusing the issues and misleading the jury. F.R.E. 403.
Wendell Quinn		None at this time.
Jan Arnette		None at this time.
Timothy Tom		None at this time.
Quingguo Tao		None at this time.
Harmanpreet Buttar		None at this time.
Yu-po Chang		None at this time.
Michael Brophy		Subject to Court's Mem. Op & Order (Dkt. No. 581), no further objection at this time.
Alan Miller		None at this time.
Steve Filton		None at this time.
Mia Meloni		None at this time.
Dwight Lacy		None at this time.
Coleby Wright		None at this time.

Witness Name	Plaintiffs' Description of Witness	Objection
Kayshon McKennery		None at this time.
CEO or Former CEO of Mayhill		None at this time.
Kenneth Chad Ellis		None at this time.
Jessica Ferguson		None at this time.
Leah Strittmatter		None at this time.
Stacy Baynham		None at this time.
Michelle Carson		None at this time.
Ethan Permenter		None at this time.